

7-23-92
12.3.8 v.6

ASH GROVE CEMENT COMPANY
WESTERN REGION

MEMORANDUM

TO: Hans Steuch
FROM: Doug Hale *DH*
DATE: 7/23/92
SUBJECT: Waste oils @ Seattle
COPIES TO: Ken Rone
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In regard to your 7/1 memo about storage and disposal of waste oils, please accept the following comments.

First, I hope that Seattle can maintain a Conditionally Exempt Small Generator status in regard to waste oils/solvents. That is a status where no more than 220 pounds of hazardous waste is generated per month and no more than 2,200 pounds of waste is stored on site. This status exempts the facility from the bulk of RCRA regulations.

Second, burning these materials for energy recovery will require meeting two regulatory hurdles. The filing of a RCRA Section 3010 Notification of Hazardous Waste Activity to EPA and the state. This document simply I.D.'s the facility for the activity via an EPA ID #. The potentially most troublesome hurdle will be to amend the air permit, if so required, to include used oil as a permitted fuel. I don't recall if either of these items have been done for the Seattle facility.

Let's discuss this in further detail before we attempt to amend the permit, if required.

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